

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF LOUISIANA

JO ANN BISHOP, ET AL,

Plaintiffs,

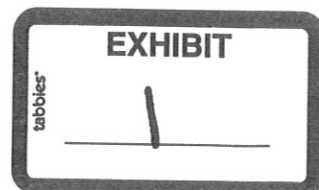
vs.

Case No.:07-2832

SHELL OIL CO., ET AL,

Defendants.

VIDEOTAPED TELEPHONE DEPOSITION of **JOHN**
SPENCER, C.I.H, C.S.P., held on July 1, 2009, at 6745
Rock Spring Road, Wilmington, North Carolina, commencing
at 9:02 a.m., before Laura L. Van Sandt, a Court Reporter
and Notary Public in and for the State of North Carolina.



J. SPENCER, C.I.H., C.S.P.

APPEARANCES:

On behalf of the Plaintiff:

(Telephonically)

L. ERIC WILLIAMS, JR. ESQUIRE

3021 35th Street, Suite B

Metairie, Louisiana 70001

(504) 832-9898

RICHARD J. FERNANDEZ, ESQUIRE

3000 West Esplanade Avenue, Suite 200

Metairie, Louisiana 7002

(504) 834-8500

On behalf of the Defendants:

STAN PERRY, ESQUIRE

HAYNES AND BOONE, LLP

1221 McKinney Street, Suite 2100

Houston, Texas 77010-2007

(713) 547-2039

Attorneys for Shell Oil

J. SPENCER, C.I.H., C.S.P.

APPEARANCES: (CONT'D.)

GLENN M. FARNET, ESQUIRE

KEAN, MILLER, HAWTHORNE D'ARMOND,

McCOWAN & JARMAN, LLP

22nd Floor, One American Place

Post Office Box 3513

Baton Rouge, Louisiana 70821

(225-387-0999

Attorneys for Shell Oil, Shell Chemical,

Marathon Oil, El Paso

JAMES M. RILEY, ESQUIRE

(Telephonically)

COATES, ROSE, YALE, RYMAN & LEE, LLC

3 E. Greenway Plaza, Suite 2000

Houston, Texas 77046

(713) 653-7375

Attorneys for Radiator Specialty Company

J. SPENCER, C.I.H., C.S.P.

APPEARANCES: (CONT'D.)

CHRISTOPHER T. CHOCHÉLES, ESQUIRE

(Telephonically)

SHER GARNER LAW FIRM

909 Poydras Street, 28th Floor

New Orleans, Louisiana 70112

(504) 299-2100

Attorneys for Murphy Oil

J. SPENCER, C.I.H., C.S.P.

INDEX TO EXHIBITS

DESCRIPTION

MARKED

Exhibit-1 17

Notice of Video-Telephone Deposition

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Disk Containing Items Responsive to Notice

1 J. SPENCER, C.I.H., C.S.P.

2 A. John Spencer, 8805 Columbia 100
3 Parkway in Columbia, Maryland.

4 Q. And what's your date of birth, sir?

5 A. 12 February 1954.

6 Q. And your Social Security?

7 A. I don't want to give that out.

8 Q. You don't want to give that, okay.

9 And say your date of birth again?

10 A. 12 February 1954.

11 Q. 2/12/54?

12 A. Yes.

13 Q. Okay, what degrees have you earned,
14 Mr. Spencer?

15 A. I have a degree in biological
16 sciences from the University of Maryland.

17 Q. Okay, any other degrees?

18 A. No.

19 Q. Okay, did you take any Masters
20 classes?

21 A. Yes.

22 Q. Okay, and did you finish your
23 Masters degree?

24 A. I did not. I did not finish my
25 thesis.

1 J. SPENCER, C.I.H., C.S.P.

2 Q. And why not?

3 A. Three kids and starting a new
4 business.

5 Q. Okay, were you asked to leave the
6 school?

7 A. No.

8 Q. Okay, and what curriculum were you
9 studying in your Masters program?

10 A. It was environmental biology.

11 Q. And how many hours did you complete?

12 A. Twenty-six.

13 Q. Do you consider to be an ex --
14 yourself to be an expert in biology?

15 A. Certainly as a consultant I work in
16 that area. I've never testified as an
17 expert in biology, however. So if your
18 question is with regards to from a legal
19 standpoint, frankly I've never been put up as
20 a biologist before.

21 Q. Do you consider yourself to be an
22 expert in the field of chemistry?

23 A. Again, it is a significant part of
24 what I do, but I've never been put up as a
25 -- specifically as a chemist.

1 J. SPENCER, C.I.H., C.S.P.
2 to be an expert in?

3 A. Well, exposure assessment; employer
4 health and safety and environmental programs;
5 product warnings; those are the primary ones
6 from -- again from a legal standpoint.

7 Q. Do you consider yourself to be an
8 expert in the field of chemical engineering?

9 A. No, I do not.

10 Q. What about the field of chemical
11 composition of substances?

12 A. Well, again, it is a large part of
13 what I do as an industrial hygienist.
14 Certainly I've had --

15 Q. When I say -- let me give you a
16 fairer question; the quantification of
17 chemical compositions of substances?

18 A. I don't know that I'm following what
19 do you mean -- what you mean by
20 quantification.

21 Q. If I gave you a solvent and I said
22 can you tell me what -- what the historical
23 amount of benzene was in that solvent, would
24 you consider yourself to be an expert in
25 that field?